



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 21, 2003

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Coachmen REcreational Vehicle Company, LLC / 039-17850-00062

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER-MOD.dot 9/16/03

October 21, 2003

Mr. Mike Terlep  
Coachmen Recreational Vehicle Company, LLC  
P. O. Box 30  
Middlebury, IN 46540

Re: 039-17850  
Minor Source Modification to:  
Part 70 Permit No.: T039-6922-00062

Dear Mr. Terlep:

Coachmen Recreational Vehicle, was issued Part 70 operating permit No. 039-6922-00062 on June 9, 1999, for the operation of a recreational vehicle manufacturing source. An application to modify the source was received on August 18, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (1) Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01, and 220-02, using a black haps-free enamel coating at a maximum rate of 1 gallon per hour, equipped with dry filters, exhausting to Stacks No. 9 and 10.
- (2) One (1) dust collector in Plant 220.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

mm

cc: File - Elkhart County  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR QUALITY**

**Coachmen Recreational Vehicle Company, LLC  
Middlebury Facility  
423 North Main Street  
Middlebury, Indiana 46540**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No.: 039-17850-00062	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 21, 2003

- (f) Twelve (12) assembly areas for the application of plumbing adhesives, collectively known as EU8, conducted in Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (g) Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 103, 105, 110, 150, 205, 210, 220 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (h) Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01, and 220-02, using a black haps-free enamel coating at a maximum rate of 1 gallon per hour, equipped with dry filters, exhausting to Stacks No. 9 and 10.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Woodworking with cyclone and baghouse with less than 5 pounds per hour and 25 pounds per day of PM<sub>10</sub> emissions.
- (d) One (1) dust collector in Plant 220.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 Permit by 326 IAC 2-7-2 (Applicability) because:

It is a major source, as defined in 326 IAC 2-7-1(22).

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (d) Twelve (12) spray coating areas for the application of undercoating, equipped with airless or HVLP spray applicators, collectively known as EU9, conducted in Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (e) Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01 and 220-02, using a black HAPs-free enamel coating at a maximum rating of 1 gallon per hour, equipped with dry filters, exhausting to stacks no. 9 and 10.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The VOC content of all materials used to coat metal shall not exceed 3.5 pounds per gallon of coating less water or shall not exceed 3.5 pounds per gallon based on a volumetric weighted average pursuant to 326 IAC 8-2-9.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)] and 40 CFR 52 Subpart P

Pursuant to 326 IAC 6-3-2, the PM from EU9 and spray booths 220-01 and 220-02 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The PM from spray booths no. 220-01 and 220-02 shall be controlled by the dry filters and operated in accordance with manufacturer's specifications at all times that the two (2) paint booths are in operation. This requirement to operate the control is not federally enforceable.

### Compliance Determination Requirements

#### D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.4 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

## SECTION D.4 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) frame spray coating area, known as EU12, equipped with HVLP spray applicators and dry filters for overspray control, conducted in Plant 105, exhausted through Stacks S5 and S6, capacity: 10.0 vehicles per hour.
- (b) Twelve (12) thinning and reducing areas (Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220, and 250), collectively known as EU14, all areas (all plants) exhausted through general ventilation systems. In addition, Plant 105 has one (1) painting booth, exhausted through Stacks S5 and S6 and Plant 220 has two (2) painting booths, each equipped with air-assisted airless and HVLP spray applicators with dry filters for overspray control, capacity: 10.0 vehicles per hour total.
- (c) Twelve (12) assembly areas for the application of caulks and sealants, collectively known as EU7, conducted in Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220, and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour.
- (d) Twelve (12) spray coating areas for the application of undercoating, equipped with airless or HVLP spray applicators, collectively known as EU9, conducted in Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220, and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (e) Twelve (12) assembly areas for the application of general construction adhesives, collectively known as EU3, conducted in Plant 4, exhausted through V29 and general building ventilation, Plants 5, 6, 101, 103, 105, 110, 150, 205, 210, 220, and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (f) Twelve (12) assembly areas for the application of plumbing adhesives, collectively known as EU8, conducted in Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220, and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (g) Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 103, 105, 110, 150, 205, 210, 220, and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (h) Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01 and 220-02, using a black HAPs-free enamel coating at a maximum rating of 1 gallon per hour, equipped with dry filters, exhausting to stacks no. 9 and 10.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at the entire source including all insignificant activities shall not exceed 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

#### D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU12, EU14 and EU10 and any control devices.

### Compliance Determination Requirements

#### D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Minor Source Modification and a Minor Permit Modification  
to a Part 70 Operating Permit**

**Source Background and Description**

<b>Source Name:</b>	<b>Coachmen Recreational Vehicle Company, LLC</b>
<b>Source Location:</b>	<b>423 North Main Street, Middlebury, Indiana 46540</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3716, 3782</b>
<b>Operation Permit No.:</b>	<b>T 039-6922-00062</b>
<b>Operation Permit Issuance Date:</b>	<b>June 9, 1999</b>
<b>Source Modification No.:</b>	<b>039-17850</b>
<b>Permit Modification No.:</b>	<b>039-17934</b>
<b>Permit Reviewer:</b>	<b>Madhurima D. Moulik</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Coachmen Recreational Vehicle relating to the operation of a recreational vehicle manufacturing source.

**History**

On August 18, 2003, Coachmen Recreational Vehicle Company, LLC submitted an application to the OAQ requesting to add two (2) additional paint spray booths and one (1) dust collector to the Plant No. 220 at their existing facility. Coachmen Recreational Vehicle Company, LLC was issued a Part 70 permit on June 9, 1999.

**New Emission Units and Pollution Control Devices**

The source is proposing to add the following emission units and pollution control devices:

- (1) Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01, and 220-02, using a black haps-free enamel coating at a maximum rate of 1 gallon per hour, equipped with dry filters, exhausting to Stacks No. 9 and 10.
- (2) One (1) dust collector in Plant 220.

**Source Definition**

- (a) This recreational vehicle manufacturing company consists of twenty-two (22) plants (Plants 4 - 11, 101, 103, 105, 110, 150, 201 - 205, 210, 220 and 250), all located at 423 North Main Street, Middlebury, Indiana 46540.

Since the twenty-two (22) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

- (b) Coachmen Recreational Vehicle - Indiana is located in the Yoder Industrial Park complex along with Viking Formed Products. Both companies are commonly owned by Coachmen Industries, Inc., however, Viking Formed Products have a different first two-digit SIC code (30) than Coachmen Recreational Vehicle - Indiana (37). Less than 15 percent of the Viking Formed products are supplied to Coachmen Recreational Vehicle - Indiana. Therefore, these two companies will not be combined and will be treated as two (2) separate sources.

**Existing Approvals**

The source was issued a Part 70 Operating Permit 039-6922-00062 on June 9, 1999.  
The source has since received the following:



- (a) First Administrative Amendment No.: 039-13811, issued on March 21, 2001;
- (b) First Reopening No.: 039-13219, issued on December 10, 2001; and
- (c) Second Administrative Amendment No.: 039-17307, issued on March 18, 2003.

### Stack Summary of Modification

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S9	Paint Booth 220-01	38	3.5	22,600	Ambient
S10	Paint Booth 220-02	38	3.5	22,600	Ambient

### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on August 18, 2003.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### Potential to Emit of the Source Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	12.31
PM-10	12.31
SO <sub>2</sub>	-
VOC	23.94
CO	-
NO <sub>x</sub>	-

HAPs	Potential to Emit (tons/yr)
Single HAP	-
Total	-

### Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B), which states in part that a minor source modification is appropriate for modifications that would have a potential to emit “less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of volatile organic compounds (VOC)”. The VOC potential to emit of the two (2) additional paint spray booths falls within this range (see Emissions Calculations section). Also, the potential to emit of PM/PM-10 is greater than 5 tons per year and less than 25 tons per year, which requires a

minor source modification pursuant to 326 IAC 2-7-10.5(d)(4)A). Additionally, the Part 70 permit will be modified through a Minor Permit Modification pursuant to 326 IAC 2-7-12 (b)(1)(B), which states that a minor permit modification is appropriate for modifications that “do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit”.

### Potential to Emit of the Source After Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC <sup>1</sup>	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

HAPs	Potential to Emit (tons/yr)
Single HAP	greater than 10
Total	greater than 25

<sup>1</sup> The source had a limited potential to emit of 249 tons per year at the time of issuance of Part 70 permit no. 039-6922-00062. The source has agreed to maintain the 249 tons per year limit after this minor source modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to the two (2) frame spray painting booths, identified as 220-01 and 220-02.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Wood Furniture Manufacturing Operations, 326 IAC 14, (40 CFR 63.800 Subpart JJ) because it is a major source of HAPs as defined in 40 CFR 63, subpart A, and is involved in the manufacture of wood furniture components. The two (2) new frame spray painting booths, 220-01 and 220-02 use a HAPs-free enamel and are used for painting vehicle frames, and are therefore not subject to this rule.
- (c) The two (2) frame spray coating booths, identified as 220-01 and 220-02, are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart M) for Surface Coating of Miscellaneous Metal Parts and Products, because the enamel used at these paint booths do not contain any HAPs.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

The potential to emit of VOCs from this source is greater than 250 tons per year. However, the source agreed to limit potential VOC emissions to 249 tons per year at the time of issuance of Part 70 permit No.: 039-6922-00062. The source has agreed to maintain its PSD minor source status after the addition of paint spray booths 220-01 and 220-02. Therefore, 326 IAC 2-2 does not apply.

All other state rule applicabilities for the entire source remain unchanged from that determined in Part 70 Permit No. 029-6922-00062.

### **State Rule Applicability – Individual Facilities**

#### **326 IAC 6-3-2 (Process Operations) and 40 CFR 52 Subpart P**

The potential to emit of the spray booths no. 220-01 and 220-02 are each greater than 0.551 pounds per hour. Therefore, these emission units are subject to 326 IAC 6-3.

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the spray booths no. 220-01 and 220-02 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The PM from spray booths no. 220-01 and 220-02 shall be controlled by the dry filters and operated in accordance with manufacturer's specifications at all times that the two (2) paint booths are in operation. This requirement to operate the control is not federally enforceable.

#### **326 IAC 8-2-9 (Miscellaneous Metal Coating)**

This source has surface coating operations for coating metal parts and falls under the Standard Industrial Classification Code of major group # 37. Therefore, it is subject to the requirements of 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the spray booths identified as 220-01 and 220-02 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source, the enamel used at the painting booths 220-01 and 220-02 have 2.73 pounds of VOC per gallon of coating less water. Therefore, spray booths 220-01 and 220-02 are in compliance with the requirements of 326 IAC 8-2-9.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The painting booths 220-01 and 220-02 have applicable compliance monitoring conditions as specified below:

The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAQ on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70) and demonstration of PSD Minor Status under 326 IAC 2-2 (Prevention of Significant Deterioration) rules.

In addition, painting booths 220-01 and 220-02 have additional compliance monitoring conditions as specified below:

The VOC content of materials used to coat metal in 220-01 and 220-02 must be monitored and recorded on a daily basis. The daily volume weighted average must be reported on a quarterly basis.

This monitoring condition is necessary to ensure compliance with 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations).

## Conclusion

The source modification No. 039-17850-00062 shall be added to the Part 70 permit as permit modification No. 039-17934-00062.

## CHANGES TO PART 70 PERMIT

The following changes have been made to the part 70 permit (~~strikeout~~ to show deletions and **bold** to show additions)

(1) Section A.2 is modified as follows:

- (g) Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 103, 105, 110, 150, 205, 210, 220 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (h) **Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01, and 220-02, using a black haps-free enamel coating at a maximum rate of 1 gallon per hour, equipped with dry filters, exhausting to Stacks no. 9 and 10.**

(2) Section A(3) is modified as follows:

- (d) Woodworking with cyclone and baghouse with less than 5 pounds per hour and 25 pounds per day of PM10 emissions.
- (e) **One (1) dust collector in Plant 220.**

(3) The facility description in Section D.3 is modified as follows:

- (d) Twelve (12) spray coating areas for the application of undercoating, equipped with airless or HVLP spray applicators, collectively known as EU9, conducted in Plants 4, 5, 6, 101, 103, 105, 110, 150, 205, 210, 220 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (f) **Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01, and 220-02, using a black HAPs-free enamel coating at a maximum rate of 1 gallon per hour, equipped with dry filters, exhausting to stacks no. 9 and 10.**

(4) Condition D.3.1 is modified as follows (requirements for 36 IAC 2-2 are included in section D.4):

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [~~326 IAC 2-2~~]

- (a) The VOC content of all materials used to coat metal shall not exceed 3.5 pounds per gallon of coating less water or shall not exceed 3.5 pounds per gallon based on a volumetric weighted average pursuant to 326 IAC 8-2-9.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(5) Condition D.3.2 is modified as follows:

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)] **and 40 CFR 52 Subpart P**

Pursuant to 326 IAC 6-3-2, the PM from EU9 **and spray booths 220-01 and 220-02** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**The PM from spray booths no. 220-01 and 220-02 shall be controlled by the dry filters and operated in accordance with manufacturer's specifications at all times that the two (2) paint booths are in operation. This requirement to operate the control is not federally enforceable.**

- (6) The facility description in Section D.4, which addresses the requirements under 326 IAC 2-2 (Prevention of Significant Deterioration) is modified to include the new painting booths 220-01 and 220-02.
- (g) Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
  - (h) **Two (2) frame coating high volume-low pressure (HVLP) paint spray booths in Plant No. 220, identified as spray booth no. 220-01 and 220-02, using a black HAPs-free enamel coating at a maximum rate of 1 gallon per hour, equipped with dry filters, exhausting to stacks no. 9 and 10.**

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Coachmen Recreational Vehicle company, LLC  
**Address City IN Zip:** 423 N. Main Street, Middlebury, IN 46540  
**Permit Number:** 039-17850  
**Plt ID:** 039-00062  
**Reviewer:** Madhurima D. Moulik  
**Date:** 04-Sep-03

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WR HAPs free Enamel (Booth 220-01)	9.8	28.00%	0.0%	28.0%	0.0%	72.00%	1.00000	1.000	2.73	2.73	2.73	65.59	11.97	6.16	3.80	80%
WR HAPs free Enamel (Booth 220-02)	9.8	28.00%	0.0%	28.0%	0.0%	72.00%	1.00000	1.000	2.73	2.73	2.73	65.59	11.97	6.16	3.80	80%

**State Potential Emissions**                      **Add worst case coating to all solvents**                      **5.47**                      **131.17**                      **23.94**                      **12.31**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used